

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>		:	<b>Bankruptcy No. 19-10852-TPA</b>
<b>Derek S. Kerr,</b>		:	
	<b>Debtor</b>	:	<b>Chapter 13</b>
		:	
<b>Derek S. Kerr,</b>		:	<b>Related to Docket No. 107</b>
	<b>Movant</b>	:	
		:	
	<b>v.</b>	:	
<b>Quicken Loans, Inc.,</b>		:	
	<b>Respondent</b>	:	
<b>Ronda J. Winnecour, Esquire,</b>		:	
<b>Chapter 13 Trustee,</b>		:	
<b>Additional Respondent</b>		:	

**Exhibit “A”**

Borrower Name: Kerr, Derek  
Property Address: 8 Elm Drive Brookville, PA 15825  
Servicer Name: Quicken Loans Inc.  
Loan Number: 8673349332829

### Full History

Date	Activity By	Action Taken
11/22/2019 10:52:32 AM ET	Attorney	File Submitted
<p>File Submitted by Jessica Tighe.</p> <p>The following documents were submitted:</p> <p><a href="#">Kerr (Loan #8673349332829) - Borrower Authorization (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - HAMP Request for Mortgage Assistance (RMA) (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Uniform Borrower Assistance Form (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Mortgage Assistance Application Form 710 (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Financial Statement (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Hardship Letter (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - IRS Form 4506-T (Borrower) (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Dodd-Frank Certification (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Client Information (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Hardship Information and Documentation (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Current Household Income (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Current Household Assets (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Household Monthly Expenses &amp; Debt (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Acknowledgement and Agreement (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Borrower Income (Wages) - Most recent 2 pay stubs (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Co-Borrower Income (Wages) - Most recent 2 pay stubs (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Most Recent 2 Months Bank Statements (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Most Recent 2 Tax Returns (Added 11-22-2019)</a></p> <p><a href="#">Kerr (Loan #8673349332829) - Loss Mitigation Order (Added 11-22-2019)</a></p>		

Date	Activity By	Action Taken
12/03/2019 05:30:43 PM ET	Servicer	File Opened
File Opened by Mike Jagitsch		

Date	Activity By	Action Taken
12/18/2019 02:24:52 PM ET	Servicer	Docs Incomplete Notice
<p><b>File Rejected by:</b> Mike Jagitsch.</p> <p><b>Reason:</b> Incomplete Package</p> <p><b>Due Date:</b> 01-06-2020</p> <p><b>Message:</b></p> <ul style="list-style-type: none"> <li><b>Borrower Income (Wages) - Most recent 2 pay stubs:</b> Please see attached incomplete letter.</li> </ul>		

Date	Activity By	Action Taken
12/18/2019 02:25:41 PM ET	Servicer	Message Sent
<b>From:</b> Mike Jagitsch (Servicer) <b>Subject:</b> Incomplete Letter <b>Message:</b> Please see letter.  <b>Attached Files:</b> <a href="#">Kerr (Loan #8673349332829) - 3349332829 Incomplete Letter.pdf (Added 12-18-2019)</a>		

Date	Activity By	Action Taken
12/19/2019 08:34:24 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Subject:</b> RE: Incomplete Letter <b>Message:</b> We will request the information and provide once it is received, thank you.		

Date	Activity By	Action Taken
01/20/2020 01:50:32 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Subject:</b> Updated Income <b>Message:</b> Attached please find the updated income for Derek & Megan Kerr. Please note that this Mr. Kerr's slow time at work and therefore he only had two pay periods for December 2019.  <b>Attached Files:</b> <a href="#">Kerr (Loan #8673349332829) - H Pay Stubs 2 (Added 01-20-2020)</a> <a href="#">Kerr (Loan #8673349332829) - W Pay Stubs 2 (Added 01-20-2020)</a>		

Date	Activity By	Action Taken
01/21/2020 10:02:13 AM ET	Attorney	Status Report Created
Jessica Tighe created Status Report  <a href="#">Download Status Report</a>		

Date	Activity By	Action Taken
02/05/2020 11:38:11 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Following up on the updated income documents that were provided January 20th. Is there an update as to the status of the review? Thank you.		

Date	Activity By	Action Taken
02/27/2020 09:35:24 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> We have received no communications on this file since December 2019. Can you please provide response/update. If we do not receive a response within 10 days; we may have to file a Motion for Status Conference due to the communications. Thank you.		

Date	Activity By	Action Taken
03/05/2020 08:11:41 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Following up on this file once again as we still have yet to receive an response since December 2019. The period terms in 13 days, if we do not receive a response prior to that time, we will move forward with the filing for Status Conference.		

Date	Activity By	Action Taken
03/13/2020 01:22:21 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Attached please find a copy of the signed Trial Period Plan that was received by mail. The originals are being returned by UPS; Tracking No. 1Z 096 FV8 84 0262 9344. We have also filed the Interim Mortgage Modification Order as the payment will be made by the Chapter 13 Trustee.  <b>Attached Files:</b> <a href="#">Kerr (Loan #8673349332829) - Trial Period Plan (Added 03-13-2020)</a>		

Date	Activity By	Action Taken
03/17/2020 02:24:58 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Attached please find the signed Interim Mortgage Modification Order. The Chapter 13 Trustee will be submitting the trial period payments.  <b>Attached Files:</b> <a href="#">Kerr (Loan #8673349332829) - Interim Mortgage Mod (Added 03-17-2020)</a>		

Date	Activity By	Action Taken
03/17/2020 02:25:16 PM ET	Attorney	Account Change
<b>File Changed by:</b> Jessica Tighe. <b>Change(s):</b> Date Loss Mitigation Period Expires changed from 03/19/2020 to 06/15/2020.		

Date	Activity By	Action Taken
06/12/2020 10:43:29 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> I am reaching out in regards to a status update on this file. We have received some documentation in regards to a payment deferral; however, Mr. Kerr was in the process of a Trial Period. Any information you can provide would be greatly appreciate, thank you.		

Date	Activity By	Action Taken
06/18/2020 10:04:07 AM ET	Servicer	Account Change
<b>File Changed by:</b> Mike Jagitsch. <b>Change(s):</b> Status changed from Incomplete to Doc Review Completed.  <b>Comment:</b> Closing application - client is currently in a COVID Forbearance.		

Date	Activity By	Action Taken
06/18/2020 10:04:45 AM ET	Servicer	Decision Reported
Decision reported by Mike Jagitsch. <b>Message:</b> Approved: Client was approved for a Trial Modification in March, 2020. They are now in a COVID Forbearance. Closing application.		

Date	Activity By	Action Taken
06/18/2020 10:29:24 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Subject:</b> RE: Account Change - Docs Complete Notice <b>Message:</b> Mike:  The file should not be closed as the forbearance documentation that we received listed only 3 months. Mr. Kerr would still wish to continue his modification proceedings after said time.		

Date	Activity By	Action Taken
07/13/2020 12:50:45 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Requesting the Portal be re-opened once again. Mr. Kerr is not completing a deferment and wishes to continue with the Loss Mitigation.		

Date	Activity By	Action Taken
07/17/2020 04:03:46 PM ET	Servicer	Message Sent
<b>From:</b> Mike Piccinini (Servicer) <b>Subject:</b> RE: Message Sent <b>Message:</b> Hello Jessica  Just want to touch base on this one. We can pursue other loss mitigation options for the client & keep them under the forbearance protections at the same time.  My suggestion would be to make the updates to the portal if any are needed to allow the client to submit an application but keep the forbearance active within our systems so the protections remain.  Let me know what you think.  Thanks		

Date	Activity By	Action Taken
07/20/2020 07:35:49 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Subject:</b> RE: Message Sent <b>Message:</b> Mike:  Mr. Kerr advised that he never requested the forbearance and that he was contacted by Quicken. He advised he is working normally and wants to continue on with Loss Mitigation. He was in a trial period; what is that status of that? He already previously provided all of his documentation and had a completed Loss Mitigation package.		

Date	Activity By	Action Taken
08/05/2020 11:38:24 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Following up on the status of Mr. Kerr's Trial Period?		

Date	Activity By	Action Taken
09/09/2020 03:03:26 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Following up once again, it has been almost 30 days with no response.		

Date	Activity By	Action Taken
09/11/2020 07:25:34 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> I will be out of the office for vacation from September 14, 2020 and return to office September 21, 2020. If you need anything while I am away, please contact Attorney Kenny Seitz directly at (814) 536-9924. Thank you!		

Date	Activity By	Action Taken
10/08/2020 09:45:14 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Subject:</b> Status Conference <b>Message:</b> Judge Agresti has scheduled the Loss Mitigation for a Status Conference on Friday, November 13, 2020 at 10:00 AM via ZOOM. A copy of the Order is attached, thank you.  <b>Attached Files:</b> <a href="#">Kerr (Loan #8673349332829) - Status Conference (Added 10-08-2020)</a>		

Date	Activity By	Action Taken
11/18/2020 07:31:55 AM ET	Attorney	Account Change
<b>File Changed by:</b> Jessica Tighe. <b>Change(s):</b> Date Loss Mitigation Period Expires changed from 06/15/2020 to 01/06/2021.		

Date	Activity By	Action Taken
11/18/2020 07:32:36 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Loss Mitigation Period extended to January 6, 2021 per Judge Agresti. Please provide response as to status of Mr. Kerr's pending loss mitigation as soon as possible, thank you.		

Date	Activity By	Action Taken
12/10/2020 01:57:37 PM ET	Servicer	Message Sent
<p><b>From:</b> Mike Piccinini (Servicer)  <b>Subject:</b> RE: Message Sent  <b>Message:</b>  Hello</p> <p>I have been working with FHA to get approval to reactivate the modification that was closed out in 05/2020. FHA has provided us approval to move forward with closing the modification. We are currently working on the final figures for an effective date of the final modification of 08/01/2020.</p> <p>Once this is completed we will issue closing documents to be executed.</p> <p>Please let me know if there are any questions.</p>		

Date	Activity By	Action Taken
12/11/2020 07:06:29 AM ET	Attorney	Message Sent
<p><b>From:</b> Jessica Tighe (Borrower Attorney)  <b>Subject:</b> RE: Message Sent  <b>Message:</b>  Is there an estimated time frame for receiving the documents?</p> <p>Also could you please upload the documents to the Portal or mail to our main business address as follows:</p> <p>The Debt Erasers</p> <p>319 Washington Street, Suite 238</p> <p>Johnstown, PA 15901</p> <p>Thank you.</p>		

Date	Activity By	Action Taken
12/23/2020 03:08:59 PM ET	Attorney	Message Sent
<p><b>From:</b> Jessica Tighe (Borrower Attorney)  <b>Subject:</b> Out of Office - Holiday  <b>Message:</b>  Good Afternoon:</p> <p>I will be out of the office from December 24, 2020 to January 4, 2021. Any messages received during that time will be addressed on January 4, 2021.</p> <p>Thank you and have a safe and happy holiday season!</p>		



Date	Activity By	Action Taken
01/04/2021 03:14:54 PM ET	Servicer	Message Sent
<p><b>From:</b> Mike Piccinini (Servicer)  <b>Subject:</b> Modification Terms  <b>Message:</b>  Hello</p> <p>We have finalized modification terms &amp; will following up with copies of the closing documents for review tomorrow morning as soon as they are generated from our Vendor.</p> <p>Thanks</p>		

Date	Activity By	Action Taken
01/05/2021 07:22:40 AM ET	Attorney	Message Sent
<p><b>From:</b> Jessica Tighe (Borrower Attorney)  <b>Subject:</b> RE: Modification Terms  <b>Message:</b>  Thank you for the update, we will await the final modification documents.</p>		

Date	Activity By	Action Taken
01/05/2021 01:35:16 PM ET	Servicer	Message Sent
<p><b>From:</b> Mike Piccinini (Servicer)  <b>Subject:</b> RE: Modification Terms  <b>Message:</b>  Afternoon</p> <p>Closing documents with the final modification details are attached for review &amp; approval.</p> <p>Thanks</p> <p><b>Attached Files:</b>  <a href="#">Kerr (Loan #8673349332829) - 3349332829 kerr closing docs.pdf (Added 01-05-2021)</a></p>		

Date	Activity By	Action Taken
01/05/2021 02:48:52 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Subject:</b> RE: Modification Terms <b>Message:</b> Mike: <p>The documents were received, we will forward on to Mr. Kerr for his review and if he wishes to accept, will forward the executed documents. Thank you.</p>		

Date	Activity By	Action Taken
01/11/2021 07:24:20 AM ET	Attorney	Account Change
<b>File Changed by:</b> Jessica Tighe. <b>Change(s):</b> Date Loss Mitigation Period Expires changed from 01/06/2021 to 02/22/2021.		

Date	Activity By	Action Taken
01/15/2021 01:05:49 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Attached please find the Loan Modification Documents; the originals were sent via U.S.P.S. - Tracking No. 9510 8157 8961 1015 5955 32. <p>Once we have received confirmation that the documents have been received and processed, we will proceed with the filing of the Motion to Approve with the Bankruptcy Court.</p> <p><b>Attached Files:</b>  <a href="#">Kerr (Loan #8673349332829) - Loan Modification (Added 01-15-2021)</a></p>		

Date	Activity By	Action Taken
01/22/2021 07:25:03 AM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Subject:</b> Status of Final Modification Docs <b>Message:</b> I just wanted to check in on the status of the final modification documents; our tracking advises the documents were delivered on January 20, 2021. Please advise that documents have been received and approved such that we may move forward with the filing of the Motion to Approve. Thank you.		

Date	Activity By	Action Taken
01/26/2021 01:26:00 PM ET	Attorney	Message Sent
<b>From:</b> Jessica Tighe (Borrower Attorney) <b>Message:</b> Just checking in on the status of the final modification documents.  We will move forward with the filing of the Motion to Approve on Friday.		